

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

JAMES CODY, <i>et al.</i> , individually and on)	
behalf of all others similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 4:17-cv-2707-AGF
)	
CITY OF ST. LOUIS,)	
)	
Defendant.)	

**NOTICE OF SETTLEMENT
AND
JOINT MOTION TO STAY PROCEEDINGS**

The Plaintiffs and Defendant (the “Parties”) hereby jointly notify this Court that the Parties have reached a settlement agreement in principle of the above-captioned matter, and accordingly move to stay all pending motions and proceedings. In support hereof, the Parties state as follows:

1. The Parties reached a settlement agreement in principle on all essential terms on February 24, 2025.
2. This settlement agreement resulted during continuing negotiations following the mediation held in November 2024.
3. Currently pending before the Court is Plaintiffs’ Second Renewed Motion for Class Certification. Doc. 401.
4. Additional time and effort are required of the Parties to draft and finalize the proposed Settlement Agreement and to get a full list of class members from third-party data providers.

5. After finalizing the agreement, the Parties anticipate submitting a Joint Motion for Preliminary Approval of Class Action Settlement, asking the Court for an order granting preliminary approval of the settlement and directing distribution of notice to class members.

6. The Parties therefore ask this Court to stay all current proceedings and pending motions, including Plaintiffs' Second Renewed Motion for Class Certification.

February 25, 2025

Respectfully submitted,

ARCHCITY DEFENDERS, INC.

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